

The Forest Landowners Association would like to submit the following comments to the Massachusetts Department of Energy Resources concerning the recent Manomet Center study concerning the budding woody-biomass energy industry in Massachusetts on behalf of our members in the state. Our main concern is the agency's misinterpretation of the Manomet Center report. We believe that the state should not make dramatic policy changes on such a narrow band of scientific data and if they do so they could ultimately set the stage for policies that accelerate forest loss in Massachusetts and elsewhere.

We hold the Manomet Center in very high regard and we are most supportive of the goals they set for this study and of its recognition of the long-term carbon neutrality of biomass, however, we disagree with the State of Massachusetts' position that burning wood is less climate friendly than burning fossil fuels – and that promoting renewable electricity generation will result in unsustainable forest management – because we see no logic or compelling evidence to support either view.

Furthermore, the idea that private landowners would clear their forests and sell high-value whole trees at a discount so they can be used to produce woody-biomass fuels is nonsensical, because it flies in the face of basic resource economics. Contrary to the state's concern in that regard, to our knowledge there is absolutely no precedent of this happening in any part of the country.”

America's 10 million private forest owners manage 60 percent of the nation's forested land base and it is expensive for them to maintain these lands, which not only provide renewable wood products, but also clean water, clean air, aesthetic values and recreational opportunities. As a result, private forest owners need vertical markets into which they can sell high-value sawtimber, mid-value pulpwood and low-value logging residuals like bark, limbs, chips and sawdust, which are the primary sources of woody-biomass fuels. Without these varied outlets for their wood products, the economics of land ownership often do not work and many forest landowners will have difficulties maintaining their forestlands as forests, which is not in the interest of society as a whole.

We would be happy to provide additional comments on our position and supporting documentation if necessary.

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